

**William G. Fig, OSB No. 952618**

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON  
PORTLAND DIVISION

**PATRICK AND HEATHER HADA,**

Case No. **3:-11-cv-1150-MO**

Plaintiffs,

v.

**GMAC MORTGAGE, LLC, MORTGAGE  
ELECTRONIC REGISTRATION  
SYSTEMS, INC., and NORTHWEST  
TRUSTEE SERVICES, INC.,**

Defendants.

**DECLARATION OF WILLIAM G. FIG  
IN SUPPORT OF GMAC  
MORTGAGE, LLC AND MERS'  
UNOPPOSED MOTION FOR  
SECOND EXTENSION OF TIME TO  
FILE FIRST RESPONSE**

I, William G. Fig, under the penalty of perjury, depose and say that:

1. I am one of the attorneys for GMAC Mortgage, LLC ("GMACM") and Mortgage Electronic Registration Systems, Inc. ("MERS"). I am over the age of 18. I have personal knowledge of the matters set forth in this declaration and would be competent to testify thereto if called to do so.

2. Either November 17 or November 22, 2011, is the current deadline for GMACM and MERS to file their first response in this matter. GMACM is currently reviewing a loan modification that may resolve this matter. Additional time is needed to

complete the review of the loan modification request. As a result the trustee's sale of plaintiffs' home has been extended. It would promote efficiency to see if the parties can resolve this matter prior to defendants having to appear in this matter.

3. Plaintiffs' counsel states that plaintiffs do not oppose or object to the request.

4. This is Defendants' second request for an extension of time.

5. I hereby declare that the statements contained herein are true to the best of my knowledge and belief, and that I understand they are made for use as evidence in court and are subject to penalty for perjury.

Dated: November 17, 2011.

SUSSMAN SHANK LLP

By /s/ William G. Fig  
William G. Fig, OSB No. 952618  
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Attorneys for GMAC Mortgage, LLC and MERS

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